

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,  
STATE OF MINNESOTA,  
STATE OF CALIFORNIA,  
STATE OF NORTH CAROLINA,  
STATE OF TENNESSEE,  
STATE OF TEXAS, and  
STATE OF UTAH,

*Plaintiffs,*

v.

AGRI STATS, INC.,

*Defendant.*

**STIPULATION FOR ORDER  
REGARDING PRODUCTION OF  
ELECTRONICALLY STORED  
INFORMATION AND PAPER  
DOCUMENTS**

No. 0:23-CV-03009-JRT-JFD

Plaintiffs United States of America and the States of Minnesota, California, North Carolina, Tennessee, Texas, and Utah (“Plaintiffs”), and Defendant Agri Stats, Inc. (“Defendant,” and together with Plaintiffs, the “Parties”) stipulate and agree to the entry of the attached Order Regarding Production of Electronically Stored Information and Paper Documents (“ESI Order”) in accordance with Rule 26 of the Federal Rules of Civil Procedure and the Court’s June 24, 2024 Scheduling Order (ECF No. 124).

Respectfully submitted by:

Dated: July 12, 2024

**FOR PLAINTIFF UNITED STATES OF  
AMERICA:**

/s/ Mark H.M. Sosnowsky  
MARK H.M. SOSNOWSKY (*Pro Hac Vice*)  
EUN-HA KIM

**FOR DEFENDANT AGRI STATS,  
INC.:**

/s/Peter H. Walsh  
Peter H. Walsh (MN# 0388672)  
Hogan Lovells US LLP

WILLIAM M. FRIEDMAN (*Pro Hac Vice*)  
JAMES H. CONGDON (*Pro Hac Vice*)  
SILVIA J. DOMINGUEZ-REESE (*Pro Hac Vice*)  
PETER A. NELSON (*Pro Hac Vice*)  
DEVIN L. REDDING (*Pro Hac Vice*)

United States Department of Justice  
Antitrust Division  
450 Fifth Street, NW, Suite 8000  
Washington, DC 20530  
Telephone: (202) 812-4723  
Mark.Sosnowsky@usdoj.gov

/s/ Liles H. Repp

LILES H. REPP

Attorney ID No. 0400692  
Assistant United States Attorney  
600 U.S. Courthouse  
300 South Fourth Street  
Minneapolis, MN 55415  
Phone: (612) 664-5600  
Fax: (612) 664-5788  
Liles.Repp@usdoj.gov

80 South 8th Street Ste 1225  
Minneapolis, MN 55402  
Tel: (612) 402-3017  
Fax: (612) 339-5167  
Email: peter.walsh@hoganlovells.com

William L. Monts III (*Pro Hac Vice*)  
Justin W. Bernick (*Pro Hac Vice*)  
HOGAN LOVELLS US LLP  
555 Thirteenth Street, N.W.  
Washington, D.C. 20004  
Tel: (202) 637-5600  
Fax: (202) 637-5910  
william.monts@hoganlovells.com  
justin.bernick@hoganlovells.com

*Counsel for Defendant Agri Stats, Inc.*

**FOR PLAINTIFF STATE OF MINNESOTA:**

KEITH ELLISON  
Attorney General of Minnesota

/s/ Katherine A. Moerke

JAMES CANADAY (No. 030234X)  
Deputy Attorney General  
KATHERINE A. MOERKE (No. 0312277)  
ELIZABETH ODETTE (No. 0340698)  
SARAH DOKTORI (No. 0403060)  
Assistant Attorneys General  
445 Minnesota Street, Suite 1400  
St. Paul, Minnesota 55101-2130  
james.canaday@ag.state.mn.us  
Telephone: (651) 757-1421

katherine.moerke@ag.state.mn.us  
Telephone: (651) 757-1288  
elizabeth.odette@ag.state.mn.us  
Telephone: (651) 728-7208  
sarah.doktori@ag.state.mn.us  
Telephone: (651) 583-6694

*Attorneys for State of Minnesota and Local Counsel for  
States of California, North Carolina, Tennessee, Texas, and Utah*

**FOR PLAINTIFF STATE OF CALIFORNIA:**

ROB BONTA  
Attorney General of California

/s/ Robert McNary  
ROBERT MCNARY (*Pro Hac Vice*)  
Deputy Attorney General  
NICOLE GORDON (*Pro Hac Vice*)  
Deputy Attorney General  
JAMIE MILLER (*Pro Hac Vice*)  
Supervising Deputy Attorney General  
PAULA BLIZZARD (*Pro Hac Vice*)  
Senior Assistant Attorney General  
Office of the Attorney General  
California Department of Justice  
300 S. Spring St.  
Los Angeles, California 90013  
Telephone: (213) 269-6283  
Robert.McNary@doj.ca.gov

*Attorneys for State of California*

**FOR PLAINTIFF STATE OF NORTH CAROLINA:**

JOSHUA H. STEIN  
Attorney General of North Carolina

/s/ Kunal Choksi  
JASMINE MCGHEE (*Pro Hac Vice*)  
Senior Deputy Attorney General

KUNAL CHOKSI (*Pro Hac Vice*)  
Special Deputy Attorney General  
114 W. Edenton Street  
Raleigh, NC 27603  
Telephone: (919) 716-7032  
kchoksi@ncdoj.gov

*Attorneys for State of North Carolina*

**FOR PLAINTIFF STATE OF TENNESSEE:**

JONATHAN SKRMETTI  
Attorney General of Tennessee

/s/ J. Tate Ball  
ETHAN BOWERS (*Pro Hac Vice*)  
J. TATE BALL (*Pro Hac Vice*)  
Assistant Attorneys General  
Office of the Tennessee Attorney General  
P.O. Box 20207  
Nashville, Tennessee 37202  
Ethan.Bowers@ag.tn.gov  
Telephone: (615) 741-8091

*Attorneys for State of Tennessee*

**FOR PLAINTIFF STATE OF TEXAS:**

KEN PAXTON  
Attorney General of Texas

/s/ Jonathan Woodward  
BRENT WEBSTER (*Pro Hac Vice*)  
First Assistant Attorney General  
GRANT DORFMAN (*Pro Hac Vice*)  
Deputy First Assistant Attorney General  
JAMES LLOYD (*Pro Hac Vice*)  
Deputy Attorney General for Civil Litigation; Chief, Antitrust Division  
TREVOR YOUNG (*Pro Hac Vice*)  
Deputy Chief, Antitrust Division

WILLIAM SHIEBER (*Pro Hac Vice*)  
JONATHAN WOODWARD (*Pro Hac Vice*)  
Assistant Attorneys General

Office of the Attorney General, State of Texas  
300 West 15th Street  
Austin, Texas 78701  
Telephone: (512) 463-1710  
Email: Trevor.Young@oag.texas.gov

*Attorneys for State of Texas*

**FOR PLAINTIFF STATE OF UTAH:**

SEAN D. REYES  
Attorney General of Utah

/s/ Marie W.L. Martin  
MARIE W.L. MARTIN (*Pro Hac Vice*)  
Assistant Attorney General

Utah Office of the Attorney General  
350 N. State Street, Suite 230  
Salt Lake City, UT 84114  
Tel: (801) 366-0375  
Fax: (801) 366-0378  
Email: mwmartin@agutah.gov

*Attorneys for State of Utah*